

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS (BOSTON)**

CHARLES BROWN, Individually and On Behalf of All Others Similarly Situated,	:	1:05-cv-10400 (RCL)
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
BIOGEN IDEC, INC., WILLIAM RASTETTER, and JAMES MULLEN,	:	
	:	
Defendants.	:	
CARY GRILL, Individually and On Behalf of All Others Similarly Situated,	:	
	:	1:05-cv-10453 (RCL)
Plaintiff,	:	
	:	
vs.	:	
	:	
BIOGEN IDEC, INC., WILLIAM RASTETTER and JAMES MULLEN,	:	
	:	
Defendants.	:	
ROCHELLE LOBEL, Individually and On Behalf of All Others Similarly Situated,	:	1:05-cv-10801 (RCL)
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
BIOGEN IDEC, INC., WILLIAM RASTETTER and JAMES MULLEN,	:	
	:	
Defendants.	:	

**MOTION OF THE BIOGEN INSTITUTIONAL INVESTOR GROUP  
FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF,  
AND APPROVAL OF LEAD PLAINTIFF'S SELECTION  
OF CO-LEAD COUNSEL AND LIAISON COUNSEL**

The New Jersey Carpenters Pension and Annuity Funds, Folksam Asset Management, Third Millennium Trading, LLP, the Deerfield Beach Non-Uniformed Municipal Employees Retirement Plan and the Plumbers and Pipefitters Local No. 520 Pension Fund (collectively, the “Biogen Institutional Investor Group” or “Movants”), by their counsel, hereby move this Court for an Order: (i) consolidating the above-captioned actions; (ii) appointing the Biogen Institutional Investor Group as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); and (iii) approving the Biogen Institutional Investor Group’s selection of Milberg Weiss Bershad & Schulman LLP and Entwistle & Cappucci LLP as Co-Lead Counsel, and Moulton & Gans, P.C. as Liaison Counsel of the actions, pursuant to the PSLRA. In support of this Motion, Movants submit herewith a Memorandum of Law, a Declaration, and a [Proposed] Order.

#### **REQUEST FOR ORAL ARGUMENT**

Movants respectfully request oral argument on this motion.

DATED: May 2, 2005  
Boston, Massachusetts

Respectfully submitted:

**MOULTON & GANS, P.C.**

By: /s/ Nancy Freeman Gans  
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***Proposed Liaison Counsel***

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*Proposed Co-Lead Counsel*

**LOCAL RULE 7.1 CERTIFICATE**

I, Nancy Freeman Gans, hereby certify that on May 2, 2005, I consulted by telephone with Matthew J. Matule, Esquire, of Skadden, Arps, Slate, Meagher & Flom LLP, counsel for all Defendants, concerning the within Motion to Consolidate, which defendants do not oppose. I notified him of the filing of the Motion for Appointment of Lead Plaintiff, and Approval of Lead Plaintiff's Selection of Co-Lead Counsel and Liaison Counsel. The issue cannot be resolved or narrowed because the filing of the Motion is required by statute.

/s/ Nancy Freeman Gans  
Nancy Freeman Gans

**CERTIFICATE OF SERVICE**

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party.

/s/ Nancy Freeman Gans  
Nancy Freeman Gans